UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	
V.)	NO. 3:22-cr-00327
)	
CHESTER GALLAGHER, et al)	JUDGE TRAUGER

MOTION TO SEAL A PORTION OF THE TRIAL TRANSCRIPT

The United States of America, by and through undersigned counsel, respectfully requests that a portion of the trial transcript be sealed pursuant to the Crime Victims' Rights Act, 18 U.S.C. § 3771(a)(1), (8) (the "CVRA"). The CVRA affords a crime victim the right to be "reasonably protected" and "treated with fairness and respect for the victim's dignity and privacy." 18 U.S.C. § 3771(a)(1), (8). The United States has attached Under Seal Exhibit A. Exhibit A contains a highlighted version of pages from the draft version of the transcript from January 26, 2024. Generally, the highlighted portions of the transcript discuss a victim's health care decisions, and should be sealed in order to protects the victim's privacy. Therefore, the United States respectfully requests that the highlighted portions of Under Seal Exhibit A be sealed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Government's Motion to Seal a Portion of the Trial Transcript was electronically filed with the Clerk on March 5, 2024, and service was made upon all persons registered in that case via CM/ECF and/or by email.

<u>s/Amanda Klopf</u> Amanda Klopf